

Date: March 19, 2013

To: Milton Dohoney, Jr., City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: David Holmes, Assistant City Manager
Dr. Noble Maseru, Health Commissioner
Kenneth Glenn, Director of Citizen Complaint and Internal Audit

Subject: **Health Department – Vital Records Audit**

Attached is the Health Department – Vital Records report. This performance audit examined and evaluated the operations and internal controls in place for the Vital Records operations. We have completed the report in accordance with Internal Audit's (IA) Fiscal Year 2012 Audit Work Plan. Due to security concerns, some elements will be redacted from any public release of this report.

We would like to thank the Vital Records staff for their assistance and cooperation during this audit.

If you need any further information please contact me.

Attachment

Health Department Vital Records

March, 2013



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Internal Audit Manager

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Executive Summary

The Vital Records Division (VR) of the Cincinnati Health Department (CHD) dispenses documents related to important health events in the lives of Ohio citizens, including birth and death certificates. The VR offices are located on the 1st and 4th floor of the Elm Street Health Clinic.

Originally, citizens could only get copies of their records in the jurisdiction in which they were born. Recently, the State of Ohio Office of Vital Statistics (OVS) has opened the availability of birth certificates to any local jurisdiction and will soon follow by opening up death certificates. For example, previously birth certificates for a citizen born in Cincinnati were only available for purchase through VR. Now, a citizen can go to any local registrar or OVS and order a copy of their certificates. This forced VR to reduce rates for birth certificates to below those of neighboring jurisdictions, and they are likely to do the same with death certificates in the near future.

VR staff told IA that citizens had expressed a reluctance to come down to Elm Street due to negative perceptions of the neighborhood and the real problems of property crime against vehicles parked near the clinic. With the availability of records from other jurisdictions, VR faces a very real threat of losing customers because of this location, particularly when the death certificates are available elsewhere.

The location of the office could pose a security problem as there are many people in the Elm Street Health Clinic that are not there for birth or death certificates

[REDACTED]

The most important recommendations in this report are related to the security of the office.

Other concerns involve disaster recovery plans, policy acknowledgement forms, receipt practices, storage for materials, and fees that are to be collected for VR.

I. Introduction

Background

The CHD is responsible for the maintenance of certain documents related to life events of Cincinnati citizens, such as birth certificates, death certificates, and burial transit permits; these documents are maintained by VR. VR operates out of the Elm Street Health Clinic with operations on the 1st and 4th floors.

OVS maintains a state-wide database which stores the majority of the information used in these records. OVS operates under authority granted by Ohio Revised Code 3705.1-99. Until recently, citizens were required to go to the local registrar of the jurisdiction in which they were born to obtain birth certificates; currently only local registrars can provide death certificates for people that died within their jurisdiction. OVS now allows any jurisdiction to provide copies of birth certificates to a citizen regardless of where they were born (provided it was within Ohio). This spring, OVS will do the same with death records.

Audit Selection

This audit was conducted in accordance with the 2012 Audit Work Plan. After a review of the programs within CHD, which included a meeting with members of the CHD administration, IA determined that an audit of VR is warranted due to the high number of contacts with the public, the amount of cash handling, and the importance of the data housed.

Audit Objectives

The primary objective of this audit was to review the policies and procedures for VR and ensure they reflect best practices in areas of cash handling, IT and physical security, disaster recover, and meeting statutory guidelines.

Audit Scope and Methodology

The audit focused on the operations of VR and the areas that fall under the section of CHD.

IA interviewed relevant staff members, reviewed regulation, witnessed cash handling procedures, and tested financial documents.

Statement of Auditing Standards

As required by Administrative Code Article II, Section 15 this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 3.96 pertaining to external peer review requirements and standard 3.76 pertaining to staff CPE requirements. These exceptions did not have a material effect on the audit. Audit fieldwork was conducted between November, 2012 and January, 2013.

II. Audit Findings and Recommendations

Security policies are not adequate.

In the event of a robbery, theft or other emergency situation, thorough security policies that are well known to employees will aid in quick and safe actions by staff and reduce chances of injury. A perpetrator of this type of crime is typically nervous and is quite possibly armed, properly constructed policies and procedures can aid employees in reacting in such a way as to decrease chances that they or another customer may be injured. Currently, policies pertain to activities within the office with no mention to security. Without a well prepared staff, employees could react poorly and a staff member or citizen could be injured, in the event of a robbery.

Recommendation 1: Vital Records should create security policies in order to better prepare staff members for worst case scenarios for their safety and that of other citizens that may be nearby.

Security training is not available to staff.

Employees that are properly trained on security policies and procedures are more likely to react professionally and resolve situations without injury than those who are not. VR staff does not currently have any training in proper behavior or policies for emergency situations. Were a situation to arise, employees or members of the public could be injured.

Recommendation 2: Vital Records should create a training program for staff members to learn proper behavior in the event of an emergency situation.

[REDACTED]

[REDACTED]

Recommendation 3

[REDACTED]

[REDACTED]

[REDACTED]

Recommendation 4:

VR staff positions are not considered “sensitive positions” by Human Resources.

HR Policies and Procedures (2.11) states that the following conditions can indicate that a position is of a sensitive nature and should have more stringent background checks: access to private home; handling of money and/or financial documents; inspections for granting of licenses, approval of work being done, etc.; contact with children; access to chemicals, drugs and/or medications; exposure to possibility of bribery/extortion; opportunity for pilferage; concerned with community security; access to sensitive information; and possession of weapons.

Currently, VR staff are not considered to occupy “sensitive positions,” even though they have access to sensitive information, handle money, have an opportunity for pilferage and could be exposed to bribery for sensitive information. These factors indicate that VR positions should be considered “sensitive” and treated appropriately.

Recommendation 5: VR should work with HR to reclassify VR positions under a “sensitive” classification.

Background checks are not being conducted when employees transfer into VR.

When an employee transfers into a sensitive position from one that is not classified as such, best practices indicate that background checks should be completed to ensure that nothing would preclude them from holding the position, as it would if they were a new-hire. Most of the employees in VR transferred into the division from elsewhere in the City (likely from a position with less sensitive information) and did not have a background check prior to their start with VR. IA has no reason to suspect that any current employees of VR have anything in their background that would prevent them from keeping their position, but best practices dictate that checks should be done to reduce risk. The nature of the information at the hands of VR employees is such that it is imperative that the City does everything in its power to ensure that the documents are secure from improper disclosure or abuse.

Recommendation 6: Background checks should be conducted for all VR employees, without regard to if they are newly hired or transferred.

Employees are not signing Employee Security Agreement Forms annually.

The City of Cincinnati Information Security Policy Employee Responsibilities Section, part 3.0, number 9 (pg 55) states: “A yearly review of the City of Cincinnati Security Policy by each user is required, and a new Employee Security Agreement Form (City of Cincinnati Information Security Policy pg.108), is to be signed by the user yearly. The Department Manager or Department Director should maintain the Employee Security Agreement Form for all their employees with Internet access.” VR distributed the document to staff in 2012, but did not obtain signatures. The purpose of the policy is to ensure that employees have acknowledged the policies in order to increase compliance and aid in disciplinary actions should the need arise.

Recommendation 7: VR should obtain signatures from staff members on the Employee Security Agreement Form annually.

The storage area for microfilm is inadequate and could result in the decay of the film.

Best practices for the storage of archival or permanent microfilm dictate that the film be stored in a climate controlled area, separate from any work areas and free of items that may off-gas and damage the film (including wooden or pressboard shelving). A halon fire suppression system should be used, as water from sprinklers could damage the film. Lacking for resources, VR currently stores microfilm in a locked room in the basement of the Elm Street Clinic. This room is not protected from water damage, nor is it controlled for humidity or climate and it requires extermination services. While much of the information on the microfilm is in the State of Ohio Office of Vital Statistics database, there are a number of certificates found to be only on microfilm. Losing these permanent documents could cause affected citizens significant issues.

Recommendation 8: New storage conditions should be obtained to protect the microfilm of birth and death certificates currently located in the basement of the Elm Street Clinic.

Disaster preparedness plans have not been completed.

Best practices indicate that in times of emergency or disaster, departments should have plans in place to ensure that necessary functions will be able to continue operations or resume after situations have returned to normal. Functioning civic operations help assure citizens in times of crisis and allow for smoother recovery. VR does not currently have a completed disaster preparedness plan. CHD began a continuity of operations plan, but due to staff turnover, have not completed it.

Recommendation 9: Continuity of operations plan should be completed.

Customers do not receive a receipt for their records.

Cash handling best practices suggest that receipts should always be given to customers for their records and to ensure accuracy if there is a discrepancy. When a transaction is made in VR, two receipts are printed and one is attached to the record request form and the other is given to the customer. The customer then waits for the file to be printed and their copy of the receipt is then exchanged for the requested document. The customer's receipt is then attached to the request form on top of the other receipt. VR staff know that a record has been provided to

a customer if there are two copies of the receipt on the request form. VR is concerned that if customers are able to keep the receipt they will attempt to use it to gain a second copy of the record without payment. Stamping the receipt or some other method of marking the receipt would alert VR staff that the receipt has already been redeemed.

Recommendation 10: VR staff should review the process for receipting for payment to allow customers to keep receipts.


Handling fees are not being collected.

Ohio Revised Code (sections 3109.14, 3705.24, and 3705.242) allows CHD to retain a portion of the fees collected and paid to the State of Ohio Office of Vital Statistics to offset the cost of collection and handling. Some of this money should be retained from funds that are sent to the State and some of it should come in the form of a refund from Hamilton County. Changes in the way that the amounts are calculated have resulted in these monies not being collected by CHD. CHD has raised concerns on these fees with the OVS, but have not received a response. The annual fees collected under these statutes is estimated to be approximately \$8,000.

Recommendation 11: VR should continue to pursue the handling fees owed by OVS and Hamilton County.

III. Conclusion

Generally, IA found that VR operated in an efficient manner and with concern for the security of information and staff members. Opportunities exist to improve these areas although significant changes may be hampered by budget constraints. Security concerns are paramount in this audit and while they may require some capital funds to accomplish, there are a variety of options available to CHD to accommodate the recommendations in this report.

 Security of information is also an important aspect of the findings and by working with HR the concerns expressed in this report can be quickly remedied. The storage of permanent microfilm to preserve it against decay is also important and VR has already expressed some ideas that will mitigate this issue.

While not a major source of revenue, the handling fees that are due to VR can offset budget issues or potential losses as competition expands for death certificates. The fees are set by state law and as such OVS should be paying what is owed to VR.

As OVS has moved to expand the capacity for citizens to obtain their records, VR has reduced prices to compete. Easy access to a new location for the facility could expand the customer base, particularly since the rates to purchase records online include very high handling fees. IA is confident that CHD will work within their constraints to address these issues and continue to provide this service to the citizens of Cincinnati.

IV. Health Department Response

Recommendation 1: Vital Records should create security policies in order to better prepare staff members for worst case scenarios for their safety and that of other citizens that may be nearby.

CHD Response: Agree. Vital Records is currently researching best practice and developing security policies that will be given to each employee. Security policies will be reviewed by the Registrar and will begin in May 2013.

Recommendation 2: Vital Records should create a training program for staff members to learn proper behavior in the event of an emergency situation.

CHD Response: Agree. Vital Records will develop a training program for burglary. Vital Records will train employees on the current fire, tornado and lockdown procedures. This training program will be implemented in May 2013.

Recommendation 3: [REDACTED]

CHD Response: [REDACTED]

Recommendation 4: [REDACTED]

CHD Response: [REDACTED]

Recommendation 5: VR should work with HR to reclassify VR positions under a “sensitive” classification.

CHD Response: Agree. Vital Records is working with Human Resources to reclassify the Vital Record positions under a “sensitive” classification. The request to reclassify positions to “sensitive” will be submitted to the March 28th Civil Service Commission meeting.

Recommendation 6: Background checks should be conducted for all VR employees, without regard to if they are newly hired or transferred.

CHD Response: Agree. Vital Records will work with Human Resources to implement a process for background checks to be conducted for newly hired and employees who are transferred into the program.

Recommendation 7: VR should obtain signatures from staff members on the Employee Security Agreement Form annually.

CHD Response: Agree. Vital Records will obtain signatures annually on the Employee Security Agreement Form.

Recommendation 8: New storage conditions should be obtained to protect the microfilm of birth and death certificates currently located in the basement of the Elm Street Clinic.

CHD Response: Agree. Vital Records will research the options for finding a more adequate storage for the microfilmed birth and death certificates. We will submit recommendations to health department senior leadership by June 2013.

Recommendation 9: Continuity of operations plan should be completed.

CHD Response: Agree. Vital Records will evaluate current operations and research options for disaster preparedness planning. After gaining input from the City Public Health Preparedness Office Vital Records will submit a continuity of operations plan to health department senior leadership and the City Public Health Preparedness Office by October 2013.

Recommendation 10: VR staff should review the process for receipting for payment to allow customers to keep receipts.

CHD Response: Agree. Vital Records will be implementing a new electronic customer queue system and will be able to provide the customer with a receipt to keep.

Recommendation 11: VR should continue to pursue the handling fees owed by OVS and Hamilton County.

CHD Response: Agree. Vital Records will continue to pursue the handling fees owed by OVS and Hamilton County.